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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LATIA ALEXANDER, individually as heir  
of ISIAIAH T. WILLIAMS, and in her  
capacity as Special Administrator of the  
Estate of ISIAIAH T. WILLIAMS,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of  
the State of Nevada; KERRY KUBLA, in his  
individual capacity; BRICE CLEMENTS, in  
his individual capacity; ALEX GONZALES,  
in his individual capacity; RUSSELL  
BACKMAN, in his individual capacity;  
JAMES ROTHENBURG, in his individual  
capacity; JAMES BERTUCCINI, in his  
individual capacity; MELANIE O'DANIEL,  
in her individual capacity and DOES I-XX,  
inclusive,

Defendants.

Case Number:  
2:24-cv-00074-APG-NJK

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTION  
DEADLINE (SECOND REQUEST)**

**MARQUIS AURBACH**

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1 Defendants Las Vegas Metropolitan Police Department (“LVMPD”), Kerry Kubla,  
2 Brice Clements, Alex Gonzales, Russell Backman, James Rothenburg, James Bertuccini and  
3 Melanie O’Daniel (“LVMPD Defendants”), by and through their counsel, Marquis Aurbach,  
4 and Plaintiff Latia Alexander, individually as heir of Isaiah T. Williams, and in her capacity  
5 as Special Administrator of the Estate of Isaiah T. Williams (“Plaintiff”), by and through her  
6 counsel of record, Breeden & Associates, PLLC, hereby agree and jointly stipulate the  
7 following:

8 1. The deadline for filing dispositive motions is **April 11, 2025**. (ECF No. 40.)

9 2. The parties are waiting for the deposition transcript of LVMPD’s Rule  
10 30(b)(6) witnesses that is critical to the parties’ claims and defenses.

11 3. Defense counsel is out of the office April 8 and 9, 2025 for oral argument at  
12 the Ninth Circuit Court of Appeals in the case of *Browning v. Las Vegas Metro Police*  
13 *Dep’t.*, Case No. 24-2034.

14 4. Therefore, the parties request a 21-day extension to file dispositive motions  
15 until **May 2, 2025**.

16 5. This request for an extension of time is not sought for an improper purpose or  
17 other purpose of delay. The parties are requesting a 21-day extension because they agree the  
18 outstanding deposition transcript is important for summary judgment purposes and defense  
19 counsel will not have adequate time to incorporate it into defendants’ dispositive motion due  
20 to the scheduled oral argument.

21 6. WHEREFORE, the parties respectfully request the dispositive motion  
22 deadline be extended to and including **May 2, 2025**.

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24 ///

25 ///

7. This Stipulation is being entered in good faith and not for purposes of delay.

IT IS SO STIPULATED this 3<sup>rd</sup> day of April, 2025.

MARQUIS AURBACH

BREEDEN & ASSOCIATES, PLLC

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By: /s/ Adam Breeden  
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MURPHY'S LAW

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Attorney for Plaintiff

**ORDER**

The above Stipulation is hereby GRANTED

IT IS SO ORDERED.

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UNITED STATES MAGISTRATE JUDGE

MARQUIS AURBACH

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